

REMARKS

Applicants reply to the Final Office Action mailed on December 31, 2008 within two months. Claims 38-69 are pending in the application and the Examiner rejects claims 38-69. Support for the amendments presented with this Reply may be found in the originally-filed specification, claims, and figures. Applicants respectfully request reconsideration of this application.

Applicants thank Examiner Vo for the interview conducted on January 30, 2009. Applicants acknowledge the Interview Summary mailed on February 2, 2009, but respectfully disagree with the Examiner's assertion that Hyuga teaches Applicants' claimed "movement vector" as further discussed below.

Applicants thank Supervisory Examiner Dastouri for the interview conducted on February 17, 2009. In that interview, Supervisory Examiner Dastouri indicated that any subsequent action issued would contain more than merely citations to figure numbers and column/line numbers in the cited references. Rather, subsequent office actions will include arguments explaining these citations.

The Examiner rejects claims "3, 40, 47, 48, 55, 63 and 67" under 35 U.S.C. § 112 as failing to comply with the written description requirement. Applicants believe the Examiner meant to reject claim 38 instead of claim 3 (claim 3 is not pending) and have treated the rejection as such. The Examiner rejects these claims, because he asserts the term "automatically" is not disclosed in the specification. Although Applicants respectfully disagree with this rejection, Applicants submit amendments to the claims to clarify that the claims are supported by the specification and to expedite prosecution. As an illustration, amended independent claim 67 recites, "predicting a future location of the object and handing off observation of the object from the first detector to a second detector in response to the second detector being selected by the processor based at least in part on the movement vector and a second observation range." Support for the amendments may be found throughout the specification, for example, "FIG. 1 illustrates a general block diagram of [a] preferred embodiment of [an] integrated fixed and/or mobile network system or apparatus for performing real-time, historical and/or predictive monitoring and data processing of one or more remote or local objects" (§ [0010]), and "[o]bject and map database structure 162 functions to determine and store each monitored object representation, as well as prior, current and likely future locations, for example, as provided from

initialization values . . . as well as processor calculated, estimated or projected values” (¶ [0065]). Applicants therefore respectfully request withdrawal of this rejection of claims 38, 40, 47, 48, 55, 63 and 67.

The Examiner rejects claims 38-41, 44, 46-49, 52, 54, 56-58, 62 and 64-69 under 35 U.S.C. § 102(e) as being anticipated by U.S. 5,818,733 (“Hyuga”). The Examiner rejects claims 42 and 50 under 35 U.S.C. § 103(a) as being unpatentable over Hyuga in view of U.S. 5,684,476 (“Anderson”). The Examiner rejects claims 43, 45, 51, 53, 55, 59, 61 and 63 under 35 U.S.C. § 103(a) as being unpatentable over Hyuga in view of U.S. 5,722,418 (“Bro”). Applicants respectfully disagree with these rejections but present claim amendments in order to clarify the patentable aspects of the claims and to expedite prosecution. Additionally, Applicants do not concede that Hyuga, Anderson, and Bro are indeed prior art with respect to this application, and Applicants reserve the option to antedate Hyuga, Anderson, and/or Bro.

Hyuga discloses a group of cameras at a location (e.g., a golf course) where each of the cameras are capable of recording an image of an object (e.g., golfer) located in a particular section of the location (e.g., at the ninth hole green). One of the cameras is selected from a known, current location of the object being observed: “Based on the locational signals from receiver (21), camera controller component (26) selects camera (27i) ~ (27n), (27c) and controls panning and tilting of the selected camera” (Abstract). The location of the object is known, for example, by a signal from a “mobile unit which is in the possession of each [golf] player or caddie . . . [which] transmits signals revealing its *location*” (4: 14-36). “Therefore, according to the invention, it is easy to *know the location* of the sender of the signals and take his picture with an imaging device” (2: 7-9) (emphasis added). Once the system in Hyuga determines *an actual location* of the object to be monitored, a camera *in the actual location* is selected to record an image of the object.

It should be noted that Hyuga is intended to monitor an object “[i]n case of an emergency such as when a player is seriously injured or collapses . . . mobile unit 1 transmits an emergency signal as well as a locational signal *indicating its own location* as determined by the location determining component” (6: 3-8) (emphasis added). Thus Hyuga is concerned with monitoring a *stationary* object during an emergency situation. For at least that reason, Hyuga does not disclose or suggest “predicting a *future location* of the object and handling off observation of the object from the first detector to a second detector in response to the second detector being

selected by the processor based at least in part on the **movement vector** and a second observation range” as recited in claim 67 (emphasis added) and as similarly recited in claims 38, 47, and 56. If Hyuga’s object is stationary, there is **no future location or movement** vector associated with the object.

In fact, nowhere does Hyuga disclose or suggest a “movement vector.” The Examiner asserts that Hyuga discloses Applicants’ “movement vector” in the following figure: “fig. 3, moving of the object from camera 27-1 to 27n” (Office Action, page 3). Presumably the Examiner is referring to the arrows illustrated in FIG. 3. These arrows, however, contain no reference numerals, and there is no discussion in Hyuga discussing what these arrows represent. Also, Hyuga is silent with respect to whether or not these arrows are used in anyway to determine a position of the object in Hyuga. For at least that reason, Applicants respectfully submit that Hyuga does not disclose or suggest a “movement vector” as recited in Applicants’ independent claims 38, 47, 56, and 67.

Furthermore, even if Hyuga did disclose a “movement vector,” there is simply no disclosure in Hyuga that contemplates using any motion of the object to determine which camera to use. Hyuga only discloses that it is the **current location** of the object that determines which camera is selected: “[b]ased on the locational signal of receiver 21, camera controller component 26 of controller component 22 is controlled so that imaging device controller component 26 **selects the most suitable camera**” (6: 37-40). Further, Hyuga teaches monitoring of a **stationary** object as noted above. Nowhere, in fact, does Hyuga disclose or suggest “**predicting a future location** of the object and handing off observation of the object from the first detector to a second detector in response to the second detector being selected by the processor **based at least in part on the movement vector** and a second observation range” as recited in independent claim 67 (emphasis added), and as similarly recited in independent claims 38, 47, and 56. For at least that additional reason, Applicants respectfully submit that independent claims 38, 47, 56, and 67 are allowable over Hyuga.

In the Interview Summary, the Examiner argues that Hyuga “clearly teaches the movement vector (col. 5, lines 39-53).” This section in Hyuga, however, merely describes how “imaging devices 27” determine the **current location** of Hyuga’s mobile unit. “The **direction** and **distance** to mobile unit 1 from any of imaging devices . . . can be determined . . . In these examples, mobile unit 1 converts the vectorial information **of its location** relative to each of

reference antennae 41 or satellites 42, or a combination thereof, into *location in terms of coordinates*, such as latitude and longitude. Consequently, the direction and distance to mobile unit 1 from any one of imaging devices . . . can be computed from the *absolute coordinate locations*" (5:39-53) (emphasis added). Thus, Hyuga merely discloses using location information to determine a *specific current location* of the object, and does not determine "a movement vector" associated with the object as recited in Applicants' independent claims.

Moreover, although Hyuga may disclose monitoring an object in a first location with a first camera and monitoring the object in a second location with a second camera, Hyuga does not disclose using "first data associated with an object in a first observation range" to "determine a movement vector" as recited in independent claims 38, 47, 56, and 67. Nothing in Hyuga indicates that any information detected by a first camera is utilized in any manner to determine a subsequent camera for use in detecting the object or to determine any information associated with the object other than visual information. For at least that additional reason, Applicants respectfully submit that Hyuga does not anticipate independent claims 38, 47, 56, and 67.

Dependent claims 39-46, 48-55, 57-66, and 68-69 variously depend from independent claims 38, 47, 56, and 67. Applicants assert that dependent claims 39-46, 48-55, 57-66, and 68-69 are thus allowable at least for the same reasons as set forth above, in addition to their own unique features, some of which are discussed below.

For example, with respect to claims 44 and 52, nowhere does Hyuga disclose, "wherein the movement vector is determined using at least one of an extrapolated positional signal, or an extrapolated visual signal." The Examiner points to FIG. 10 in Hyuga in rejecting this claim, but FIG. 10 only discloses that "the direction and distance to mobile unit 1 from any one of imaging devices 27₁~27_n, 27c can be computed from the *absolute* coordinate locations of mobile unit 1 and the imaging device" (5: 50-53) (emphasis added) – i.e., there is no "extrapolation." Neither Anderson nor Bro accounts for this deficiency in Hyuga, and Applicants thus respectfully request withdrawal of these rejections.

Further, with respect to claims 48 and 49, nowhere does Hyuga disclose or suggest "wherein the first detector is configured to predict the future location of the object and hand-off the observation of the object to the second detector in response to the movement vector indicating that the object *is about to move* into the second observation range" (claim 48) (emphasis added), or "wherein the second detector is activated in response to the processor

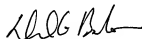
determining that the object *is traveling* from the first observation range to the second observation range” (claim 49) (emphasis added). In rejecting this claim, the Examiner states, “see figs. 3, 10, and 11” (Office Action, page 4). As noted above, FIGS. 3, 10, and 11 in Hyuga deal only with current, “absolute coordinate locations,” and Hyuga does not disclose or suggest making any determination for monitoring the object based on where “the object is about to move” or where “the object is traveling.” For at least this reason, and because neither Anderson nor Bro account for this deficiency in Hyuga, Applicants respectfully requests withdrawal of these rejections.

In view of the above remarks, Applicants respectfully submit that all pending claims properly set forth that which Applicants regard as their invention and thus respectfully request allowance of the pending claims. The Examiner is invited to telephone the undersigned at the Examiner’s convenience, if that would help further prosecution of the subject application. The Commissioner is authorized to charge any fees due to Deposit Account No. 19-2814.

Respectfully submitted,

Dated: _____

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